

# M&T Bank

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October 20, 2023

Prothonotary of Philadelphia County  
United States District Court for the  
Eastern District of Pennsylvania  
601 Market St #2609  
Philadelphia PA 19106

**RE:** ZAFTR INC n/k/a SVELLA FINANCIAL CORP v. KEVIN LAWRENCE & BVFR &  
ASSOCIATES LLC

**Case No.:** 21-CV-02177-WB

Dear Sir or Madam:

Enclosed for filing with your office are M&T Bank's responses to interrogatories. Please date stamp and return the enclosed copy in the self-addressed stamped envelope.

For any questions or concerns, please contact the undersigned.

Sincerely,

Jones, Jacqueline  
M&T Bank  
Legal Documents Processing

Enclosures:  
Responses to Interrogatories (Original and Copy)  
SASE

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

ZAFTR INC. n/k/a SVELLA  
FINANCIAL CORP.

Plaintiff,

v.

KEVIN JAMESON LAWRENCE,  
ESQUIRE; BVFR & ASSOCIATES,  
LLC; JOHN KIRK, ESQUIRE; and  
KIRK LAW PLLC

Defendants.

CIVIL ACTION

NO. 21-CV-02177-WB

**INTERROGATORIES TO GARNISHEE**

TO: M&T Bank  
117 South 18th St.  
Philadelphia, PA 19103:  
(Garnishee)

These interrogatories are being served in connection with the Writ of Execution served upon you in relation to the default judgment entered against Defendants Kevin Jameson Lawrence, Esquire and BVFR & Associates, LLC (the "defendants") in this matter. Pursuant to Pennsylvania Rule of Civil Procedure 3253 (Interrogatories in Attachment), you are required to file answers to the following interrogatories within twenty (20) days after service upon you. Failure to do so may result in judgment against you:

1. At the time you were served or at any subsequent time did you owe the defendants any money or were you liable to the defendants on any negotiable or other written instrument, or did the defendants claim that you owed the defendants any money or were liable to the defendants for any reason? n/a
2. At the time you were served or at any subsequent time was there in your possession, custody or control or in the joint possession, custody or control of yourself and one or more other persons any property of any nature owned solely or in part by the defendants?

n/a

M&T BANK HAS NO  
OPEN ACCOUNTS  
FOR ABOVE NAMED

3. At the time you were served or at any subsequent time did you hold legal title to any property of any nature owned solely or in part by the defendants or in which the defendants held or claimed any interest? n/a
4. At the time you were served or at any subsequent time did you hold as fiduciary any property in which the defendants had an interest? n/a
5. At any time before or after you were served did the defendants transfer or deliver any property to you or to any person or place pursuant to your direction or consent and if so what was the consideration therefore? n/a
6. At any time after you were served did you pay, transfer or deliver any money or property to the defendants or to any person or place pursuant to the defendants' direction or otherwise discharge any claim of the defendants against you? n/a
7. If you are a bank or other financial institution, at the time you were served or at any subsequent time did the defendants have funds on deposit in an account in which funds are deposited electronically on a recurring basis and which are identified as being funds that upon deposit are exempt from execution, levy or attachment under Pennsylvania or Federal law? If so, identify each account and state the amount of funds in each account, and the entity electronically depositing those funds on a recurring basis. n/a
8. If you are a bank or other financial institution, at the time you were served or at any subsequent time did the defendants have funds on deposit in an account in which the funds on deposit, not including any otherwise exempt funds, did not exceed the amount of the general monetary exemption under 42 Pa.C.S. § 8123? If so, identify each account. n/a
9. A complete list of all transfers and withdrawals of funds out of BVFR & Associates, LLC's M&T Bank Account ending in 1113, from August 25, 2020 to the present, identifying the amount of each transfer or withdrawal, the date of each transfer or withdrawal, and the names and addresses of each individual or institution that received funds pursuant to each transfer or withdrawal. n/a subpoena duces tecum required

The information sought by this question is not readily available from the bank's computer systems. Upon information and belief, the information sought by this question may be available from documents that can be obtained by the service of a subpoena duces tecum.

**BLANK ROME LLP**

Dated: October 3, 2023

M&T BANK HAS NO  
OPEN ACCOUNTS  
FOR ABOVE NAMED

Jacqueline Jones M&T Bank  
10/20/2023

By: /s/ Lewis W. Schlossberg

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Lewis W. Schlossberg (Pa. ID No. 91773)  
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Philadelphia, PA 19103  
(215) 569-5500

*Attorneys for Plaintiff Zaftr Inc.*

CERTIFICATE OF COMPLIANCE

I certify that this filing complies with the provisions of the *Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.

Submitted by: \_\_\_\_\_

Signature: Jacqueline Jones **M&T Bank**

Name: Jacqueline Jones M&T Bank

Attorney No. (if applicable): \_\_\_\_\_

10/20/2023